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Attorney for Defendant Shannon Blaylock

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

-000-

0 UNITED STATES OF AMERICA,) No. CR 07-0454 PJH
1 Plaintiff,)
2 vs.)
3 SHANNON BLAYLOCK, et al.,)
4 Defendant)
) DEFENDANT SHANNON BLAYLOCK'S
) PROPOSED SPECIAL VERDICT FORM
)
) Trial Date: September 15, 2008
) Pretrial Conference: August 27, 2008
) Hearing Time: 1:30 p.m.
) /

COMES NOW defendant Shannon Blaylock and proposes the following special verdict form attached hereto.

DATED: August 13, 2008
Respectfully submitted

Respectfully submitted

By /s/ Michael Stepanian
Michael Stepanian
Attorney for Defendant
Shannon Blaylock

PROPOSED SPECIAL VERDICT FORM

We, the jury find defendant Shannon Blaylock _____ (Not guilty or Guilty) of the offense of conspiracy to engage in sex trafficking of a child in violation of Section 371 of Title 18 of the United States Code as charged in Count One of the Indictment.

If you find defendant Shannon Blaylock guilty, you must answer the following questions:

- 6 (1) Do you unanimously agree that from February 2007 to March 22, 2007, defendant Shannon
7 Blaylock entered into an agreement with Tawakoni Seaton to accomplish the objective of
8 recruiting, enticing, harboring, transporting, providing, or obtaining by any means a person
9 knowing that the person had not attained the age of 18 years and will be caused to engage in a
10 commercial sex act (“the illegal objective”)?

11 || No

12 || Yes

- 13 (2) Do you unanimously agree that from February 2007 to March 22, 2007, defendant Shannon
14 Blaylock engaged in one or more overt acts in furtherance of the illegal objective? And

15 || No

16 || Yes

- 17 (3) Do you unanimously agree that the Government proved beyond a reasonable doubt that
18 defendant Shannon Blaylock had the required intent to carry out the illegal objective?

19 || No

20 || Yes

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1 We, the jury find defendant Shannon Blaylock _____ (Not guilty
2 or Guilty) of the offense of sex trafficking of a child in violation of Section 1591 of Title 18 of the
3 United States Code as charged in Count Two of the Indictment.

4 If you find defendant Shannon Blaylock guilty, you must answer the following questions:

5 (1) Do you unanimously agree that from February 2007 to March 22, 2007, defendant Shannon
6 Blaylock recruited, enticed, harbored, transported, provided, or obtained by any means
7 Victoria Stearman knowing that she had not attained the age of 18 years and was caused to
8 engage in a commercial sex act?

9 No _____

10 Yes _____

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